

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, United States of America, by authority of the Attorney General of the United States and through its undersigned attorneys, files this motion pursuant to Federal Rule of Civil Procedure 65, and respectfully moves this Court for a preliminary injunction against Jeffrey and Lauren Lowe, Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC (collectively, “Defendants”). The United States requests that pending adjudication of its claims, the Court enjoin Defendants from: exhibiting animals without a license, placing the health of animals in their care, custody, possession, and control in “serious danger,” and “taking” Endangered Species Act protected Big Cats.¹

Specifically, the United States requests that pending adjudication of its claims, the Court order Defendants to: (1) immediately cease exhibiting animals without a USDA exhibitor license; (2) within 14 days of the Court’s order, retain a qualified attending veterinarian under formal arrangements consistent with the requirements of 9 C.F.R. §§ 1.1, 2.40; (3) within 7 days of the Court’s order, provide acquisition and disposition records, including any and all veterinary records, for any and all animals added to or missing from the Lowes’ inventories since June 22, 2020; (4) within 7 days of any animal being treated by a veterinarian, submit complete and

¹ Big Cats include lions, tigers, and hybrids thereof.

accurate veterinary records to the undersigned attorneys; and (5) within 7 days of any change to the December 16, 2020 animal inventory, including the birth or death of any animal, submit acquisition and disposition records to the undersigned attorneys. This motion is supported by the accompanying Memorandum In Support of Motion for Preliminary Injunction, and Declarations and Exhibits thereto.

Pursuant to LCvR 7.1(f), counsel for the United States has attempted to confer with opposing counsel to resolve this matter. *See also* Dkt. No. 23. However, the parties were unable to reach an accord on the issues advanced in the motion for preliminary injunction.

DATED: December 23, 2020

BRIAN J. KUESTER
United States Attorney
SUSAN BRANDON, Civil Chief
United States Attorney's Office
Eastern District of Oklahoma
520 Denison Ave
Muskogee OK 74401

Respectfully Submitted,

JONATHAN D. BRIGHTBILL
Principal Deputy Assistant Attorney General
Environment and Natural Resources Division

/s/ Mary Hollingsworth
MARY HOLLINGSWORTH
Senior Trial Attorney
AZ Bar # 027080
BRIENA L. STRIPPOLI
Trial Attorney
ROBERT M. NORWAY
Trial Attorney
United States Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
Mary.hollingsworth@usdoj.gov | 202-598-1043
Briena.strippoli@usdoj.gov | 202-598-0412
Fax: 202-305-0275

Attorneys for the United States of America